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18 Unilever United States, Inc.

19
20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 OAKLAND DIVISION

23 LISA VIZCARRA, individually, and on behalf
24 of those similarly situated,

Case No. 4:20-CV-02777-YGR

25 Plaintiff,

v.

26 UNILEVER UNITED STATES, INC.,

27 Defendant.

28
**DEFENDANT UNILEVER UNITED
29 STATES, INC.'S NOTICE OF MOTION
TO DISMISS PLAINTIFF'S COMPLAINT**

30 Date: June 16, 2020

31 Time: 2:00 p.m.

32 Courtroom: 1 (1301 Clay Street)

33 Judge: Hon. Yvonne Gonzalez Rogers

NOTICE OF MOTION AND MOTION

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on June 16, 2020, at 2:00 p.m., or as soon thereafter as the matter may be heard in the courtroom of the Honorable Yvonne Gonzalez Rogers, United States District Judge, Northern District of California, located at the Oakland Federal District Courthouse, 1301 Clay Street, Courtroom 1, Fourth Floor, Oakland, CA 94612, Defendant Unilever United States, Inc. will and hereby does move for an order to dismiss Plaintiff's Complaint as to Plaintiff's claim for damages pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and Plaintiff's claim for injunctive relief pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure.

This Motion is based on this Notice of Motion and Motion, Defendant's accompanying supporting Memorandum of Points and Authorities, and the Declaration of Courtney Ozer with the exhibits thereto, as well as all other matters that may be judicially noticed or introduced at the hearing of this matter.

Dated: May 6, 2020

FOLEY HOAG LLP

By: /s/ Philip C. Swain
Philip C. Swain

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*Attorneys for Defendant Unilever
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PROOF OF SERVICE

I, Jennifer Yoo, hereby certify that on May 6, 2020, I caused the foregoing document to be electronically filed with the Clerk of the Court for the United States District Court, Northern District of California, by using the CM/ECF system and electronically served to all counsel of record. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: May 6, 2020

/s/ Jennifer Yoo

Jennifer Yoo